

FILED
Clerk
District Court

MAY - 4 2007

For The Northern Mariana Islands
By _____
(Deputy Clerk)

UNITED STATES DISTRICT COURT

NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,

Plaintiff,

v.

SUN, WEI QIN,

Defendant.

Criminal Case No. CR 07 - 00009

INDICTMENT

Title 18, U.S.C., §§ 2421, 2 - Foreign
Transportation for Prostitution (Ct. 1);
Title 18, U.S.C., §§ 2314, 2 - Foreign
Transportation of Persons in Execution of
Fraud Scheme (Ct. 2).

THE GRAND JURY CHARGES:

COUNT ONE

FOREIGN TRANSPORTATION FOR PROSTITUTION

1. On or about March 2, 2007, in the District of the Northern Mariana Islands and elsewhere, SUN, WEI QIN, the defendant, unlawfully, willfully and knowingly, transported an individual, to wit, Lin, Xiu Lan, in interstate and foreign commerce, and in any Territory and Possession of the United States, with the intent that such individual engage in prostitution and in sexual activity which would constitute a criminal offense under 6 N. Mar. I. Code §§ 1342 and 1343, (Title 18, United States Code, Sections 2421 and 2).

THE GRAND JURY FURTHER CHARGES:

COUNT TWO

FOREIGN TRANSPORTATION OF PERSON IN EXECUTION OF FRAUD SCHEME


2. On or about March 2, 2007, in the District of the Northern Mariana Islands and elsewhere, SUN, WEI QIN, the defendant, unlawfully, knowingly and wilfully, having devised and intending to devise a scheme and artifice to defraud and for obtaining money by means of materially false and fraudulent pretenses, representations and promises, transported and caused to be

1 transported, and induced Lin, Xiu Lan, to travel in, and be transported in, interstate and foreign
2 commerce in the execution and concealment of a scheme and artifice to defraud such person of
3 money and property having a value of \$5,000 and more,

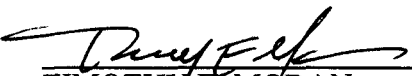
4 (Title 18, United States Code, Sections 2314 and 2).

5
6 Dated this 4 day of May, 2007.

8 A TRUE BILL.

9
10 
11 _____
12 Foreperson

12 LEONARDO M. RAPADAS
13 United States Attorney
14 Districts of Guam and CNMI

15 By: 
16 TIMOTHY E. MORAN
17 Assistant United States Attorney
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